ADDENDUM TO FACT SHEET FOR MODIFICATION TO NPDES PERMIT WA-003134-8 PUGLIA ENGINEERING, INC.

The Puglia Engineering National Pollutant Discharge Elimination System permit WA-003134-8 requires compliance with surface water quality criteria by September 1, 2003, and the submission of an engineering report to meet this requirement by December 1, 2002. Puglia appealed the permit requesting:

- 1. granting a mixing zone,
- 2. extending the compliance schedule for the engineering report submission, and
- 3. extending the date to meet water quality criteria.

During the time of the appeal on August 24, 2004, Tamara Archer of the Bellingham Field Office found that Puglia discharged to Bellingham Bay industrial stormwater without authorization through vents or drains in the drydock.

The permit requires a design to collect and treat all industrial stormwater including the drydock vents to meet water quality criteria up to the 10-year 24-hour design storm. This design will also protect the 303d listed sediments from Puglia's contaminated stormwater discharges. The Department proposes to grant a mixing zone for discharges during periods exceeding this precipitation event.

The permit also extends the compliance schedule for attainment of the criteria to September 1, 2005. In the interim period, performance-based effluent limitations are established as AKART. After the compliance period, surface water quality-based effluent limitations are established taking into account the mixing zone dilution ratio for the approximately one discharge that will occur in a ten-year period.

Puglia's preferred alternative is discharge to the sanitary system. The Department approved the engineering report for discharge to the City of Bellingham sewage treatment plant.

The permit also specifically prohibits all stormwater discharges from the drydock while a vessel is on the drydock including but not limited to vents, ports, scuppers, and drains.

PUBLIC NOTICE

The proposed changes to this permit are considered a major modification under 40 CFR 122.62. Consequently, the draft permit modification is required to be published for a thirty (30)-day public review and comment period. The Department published a Public Notice of Draft Permit Modification on April 19, 2005, in the *Bellingham Herald*. No comments were received.

Addendum to Fact Sheet for Modification to NPDES Permit WA-003134-8 Puglia Engineering, Inc.

Maximum Jaily Limit (MDL) Comments A ug/L 490.6	Average aximum rd Limit Daily Limit c (AML) (MDL) Comments A ug/L ug/L Ug/L 336.3 490.6 5542.7 8085.8	Water Average Coulity Monthly Maximum Standard Limit Dally Limit Chronic (AML) (MDL) Comments A ug/L ug/L ug/L 3.1000 336.3 490.6 81 5542.7 8085.8
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Copper					COPPER	Log Normal	LEAD	Log Normal	ZINC	Log Normal
				04-SEP-02	414	6.03	31	3.43	1090	66.9
PERFORI	PERFORMANCE-BASED EFFLUENT LIMITS			01-FEB-03	305	5.72	38	3.64	772	6.65
EXCEL TO PERFORM THE LOGNORMAL TRANSFORMATION	MAL TRANSFORMATION			01-MAR-03	453	6.12	1020	6.93	772	6.65
CALCULATE THE TRANSFORMED MEAN AND VARIANCE	MEAN AND VARIANCE			01-APR-03	969	6.55	35	3.56	1500	7.31
				01-MAY-03	294	2.68	2	1.61	1280	7.15
	LOGNORMAL TRANSFORMED MEAN	ORMED MEAN =	5.832052762	01-JUN-03	780	99.9	37	3.61	1830	7.51
"LOGNORMAL TRANSFORMED VARIANCE =	ORMED VARIANCE =		0.865481646	01-AUG-03	362	5.89	2	1.61	1450	7.28
ER OF SAMPLES/MONTH FOR	NUMBER OF SAMPLES/MONTH FOR COMPLIANCE MONITORING =		1	01-SEP-03	1110	7.01	25	3.22	1320	7.19
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	E(X) =		525.7331	01-NOV-03	45	3.81	2	1.61	141	4.95
	= (X)X		380361.393							
	VARn		0.8655	AVERAGE	458.8		120.6		1025.2	
	MEANn=		5.8321	Number of Data	10		10		10	
	VAR(Xn)=		380361.393							
					Columni	1			Column1	nn1
MAXIMUM DAILY EFFLUENT LIMIT	IENT LIMIT =		2968.939							
AVERAGE MONTHLY EFFLUENT LIMIT =	FFLUENT LIMIT =		1575.640		Mean	5.832053			Mean	6.625998578
1575.64 1540.261					Standard Error	0.294191			Standard Error	0.323761228
					Median	5.958755			Median	7.074274166
					Mode	#N/A			Mode	6.64898455
					Standard Deviation	0.930313			Standard Deviation	1.023822898
ZINC					Sample Variance	0.865482			Sample Variance	1.048213326
					Kurtosis	1.603668			Kurtosis	0.991188607
					Skewness	-1.14358			Skewness	-1.511334875
PERFOR	PERFORMANCE-BASED EFFLUENT LIMITS				Range	3.205453			Range	2.937360267
EXCEL TO PERFORM THE LOGNORMAL TRANSFORMATION	MAL TRANSFORMATION				Minimum	3.806662			Minimum	4.574710979
CALCULATE THE TRANSFORMED MEAN AND VARIANCE	MEAN AND VARIANCE				Maximum	7.012115			Maximum	7.512071246
					Sum	58.32053			Sum	66.25998578
	LOGNORMAL TRANSF	FORMED MEAN =	6.63		Count	10			Count	10
"LOGNORMAL TRANSFORMED VARIANCE =	ORMED VARIANCE =		1.05							
ER OF SAMPLES/MONTH FOR	NUMBER OF SAMPLES/MONTH FOR COMPLIANCE MONITORING =		-							
AUTOCORRELATION FACTOR(ne)(USE 0 IF UNKNOWN) =	USE 0 IF UNKNOWN) =		0							
	E(X)=		1280.4924							
	= (X)/V		3045917.873							
	VARn		1.0500							
	MEANn=		6.6300							
	VAR(Xn)=		3045917.873							
MAXIMUM DAILY EFFLUENT LIMIT =	JENT LIMIT =		8212.731							
AVERAGE MONTHLY EFFLUENT LIMIT =	FFLUENT LIMIT =		4087.233							